

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Reelle K. Witherspoon,	:	Chapter 13
	:	
Debtor(s)	:	Case No. 20-12616-MDC

DEBTOR'S MOTION FOR REIMPOSITION OF THE AUTOMATIC STAY AS TO PROPERTY OF THE ESTATE

Debtor hereby moves this Court for reimposition of the automatic stay with respect to her residential property located at 2625 S. 78th Street, Philadelphia, PA 19153, which is property of the estate, and in support thereof avers as follows:

1. On September 30, 2022, this Court entered an Order terminating the automatic stay, with respect to the Debtor's residence, in favor of Habitat for Humanity Philadelphia, Inc., and its successors in title.
2. The Debtor's residence is and at all times relevant to this case has been an asset included in the Debtor's bankruptcy estate.
3. The Order granting relief from stay was based solely on evidence that the Debtor defaulted on a stipulation agreement to pay mortgage arrears.
4. The total due is \$3,864.56.
5. Debtor fell behind because she was supporting her son and two grandchildren, after her son lost his job, and a daughter suffering from sickle cell.
6. Debtor's son is now re-employed, has moved out of Debtor's home, and Debtor is now able to resume submitting mortgage and plan payments.
7. Debtor can cure the total due by amending the plan, and Debtor has sufficient income to support the new plan payment.

WHEREFORE, the Debtor requests that this Court reimpose the stay applicable to Habitat For Humanity Philadelphia, Inc., and its successors in title, protecting Debtor's residence.

Respectfully Submitted,

DISTRICT COUNCIL 33 LEGAL SERVICES
PLAN

Date: October 27, 2022

By: /s/ Henry A. Jefferson
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